3/2/17: W.WA Municipal Stormwater Permit Reissuance public meeting w/webinar option– Lacey

In attendance

Participants: In-person: 37 + webinar: 42 |**TOTAL = 79**

Compilation of notes on topics – *the following has been summarized and paraphrased for length. See meeting agenda, and presentation for additional context.*

Watershed-scale stormwater planning

Do you see value in developing a watershed-scale stormwater plan to inform your SW Program?

- Yes, integration is key to this work, and it makes sense to do it on a watershed scale. The intent of having science and planning guide operation/capital is worthwhile.
- Yes, local control, and need for flexibility
- Only valuable where there are multiple watersheds
- Yes, consider existing resources (WRIA planning, TMDLs, local prioritization); consider flexible scale
- Yes, as long as scale is appropriate for the jurisdiction; different value at varying scales – find balance between what you can learn at different scales; need flexibility to choose where to focus resources
- Yes/No – bring together all that currently exists; scale is very important & flexibility
- Value depends on:
    - How it is used to inform implementation
    - How to build on past/existing work
    - Need to consider population growth and climate change
    - Being able to use info proactively
    - Integrate with TMDLs
    - Local politics

What are different ways that Permittees could potentially use prioritized watersheds/drainage basins to help inform SWMP implementation? [capital projects, education and outreach, source control, etc.]

- This would help prioritize the budget to capital, E&O, source control, public involvement, sampling/testing
- SWMP implementation – prioritization, scheduling, funding; useful for capital projects, E&O, source control
- Don't make too large of scale with too many entities involved
- Build on current data – don't reinvent the wheel
- SW is not the biggest driver of WQ issues in our county

What are some potential data gaps to developing this plan?

- Non-environmental considerations
- How to weigh political drivers into prioritization
- Flexible resources (time, labor, $), equipment, consultant costs
- Multi-jurisdictional MOUs
- Climate change – appropriate for permit

What guidance or resources would you like to see provided and why?

- Identify cross-jurisdiction leads (basin stewards); How to prioritize watersheds
- Connect monitoring data to help prioritize what waterbodies to do focused planning in; watershed/basin planning should complement permit requirements (source control, E&O, etc.)
- Continued capacity grant funding; specific data requirements; specific watershed template
- How to phase/step the process so that there is an implementable plan after planning is done

Business Inspection Source Control Program for Phase II

Do you see value in adding a business inspection source control program to Phase II city and county stormwater management programs? Please elaborate.

- No, jurisdictional specific; drinking water programs; pond/inspection program already exist; duplicative; expand inspection program/coverage to all SW facilities
- Yes, from a PH I perspective, this will address a pollutant source that is currently unaddressed. Tie E&O with business inspections is important; maximize flexibility – outcome based approaches
- Yes, but isn't this something we already do/does it need to be a permit requirement?
- Yes, but I also see a lot of extra effort, cost
- In a phased approach due to cost and coordination
- The requirement can help with interdepartmental Coordination – which could help to avoid redundancy or multiple inspections
- Mobile businesses are challenging

What changes, if any, to Phase II jurisdictions' local codes must be made in order to ensure local authority to require the use of stormwater pollution prevention BMPs at existing businesses? How much time would that take?

- None for us. At the last update, we focused on system, not simply permit coverage
- Need to perform site visits to determine the types of pollutant generating activities
- Update ordinances/muni code, IDDE enforcement – 1-2 years, Need a business Stormwater Pollution Prevention Plan template
- Land use permitting, interjurisdictional coordination
- Based on water code; 2-3 years to get up to speed with code
- Stronger code with the ability to fine/enforcement

How would you develop an inventory of potentially pollutant generating commercial properties and/or businesses in your jurisdiction?

- Done by our drinking water utility – target toward most critical recharge/source contributing area - uses online data sources; windshield surveys; business licensing
- Parcel-based inventory (county); business license inventory (city); visit businesses to prioritize – E&O provided, determine pollutant generating activities; set inspection frequency based on priority
- Well head inventories
- Fire Dept. list of properties with hazardous materials

What guidance or resources would you like to see provided and why?

- Connection to E&O requirements; do a social marketing approach to target specific businesses
- Address language barriers
- Keep the performance req. that follow-up inspections count
- Need
    - 2-3 years for code updates
    - Phase in approach would be beneficial
    - Guidance for inventory/inspections/checklists
    - Program development guidance
    - Lessons learned from Phase I
    - Need time (and funding) to bring on staff
    - System to coordinate inspections – between health, and the Industrial Stormwater General Permit (ISGP)
    - Flexibility in the program but clear permit language and min. requirements

Outfall Reporting

- What is the best way to connect outfalls to receiving waters
    - Can ECY do this with other data provided by permittees
- Consider adding a field indicating if there is a flow control structure
- How with the data be used?
- Is GIS shapefile acceptable

O&M

- Line cleaning is very expensive
- Need to plan data collection in advance in order to document for a reduced inspection frequency
- Provide allowance to reduce maintenance response to a 95% compliance standard
- More cost-effective to do inspections for WQ or Flow control facilities every 2 years
- Refine functional maintenance definitions
- Consider where sweeping and line cleaning is most appropriate, and keep in mind the rural-urban gradient and land use
    - Prioritize urban land use over rural land use
- Annual sweeping in urban areas is not enough

- For rural areas, consider proximity to receiving waters, # of road crossings, timing should be at least annual, at spring or fall
- Sweep based on road classification

- Recommend allowing sweeping as a tool rather than mandated
- Requirement should be based on science/data
- Add sweeping to IDDE or source control as part of those programs – phased in
- Consider the maintenance needs and costs of sweepers, as well as the short life cycle

SWMMWW

- Provide consistent definitions between the permit and manual
- Don't release drafts for review during holidays
- Don't require similar format changes for equivalent manuals
  - Would like to not have to update equivalent manuals in the upcoming permit cycle
- Wetland starvation is a problem
  - Update criteria so that it works better with Min. requirements
- Plan on 18 months for equivalency/adoption
- Can technical design info be separated from regulatory language?
  - Each jurisdiction is going through a similar process
  - Technical language is easy to adopt directly
  - So jurisdictions can only adopt technical design standards/BMPs – then phase Is won't have to do own manuals

Open Discussion

- More consideration of how sections of the permit complement each other
- Can we have a Phase 3 permit for jurisdictions smaller than 10k
- Make secondary permittees contribute to RSMP
  - Many secondaries do not have a permit, will those entities get coverage?
- Can PH II counties also have Ecology's review their manuals for equivalency?
- Try to combine or dovetail permit sections that have overlap – e.g. IDDE, public ED & O